



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10  
SEATTLE, WASHINGTON 98101

January 30, 1987

REPLY TO  
ATTN OF:

M/S 329

MEMORANDUM

SUBJECT: Review of Yakima Agricultural Research Lab Closure Plan

FROM: Jim Pankanin  
Environmental Services Division

TO: Lydia Reynolds  
Superfund Enforcement Branch M/S 525

JAN 30 1987

THRU: Paul Boys, Chief  
Technical Support Section

Superfund Branch

As we discussed earlier this week, I have reviewed most of the applicable material regarding the proposed closure of the Yakima Agricultural Research Lab (YARL). The plan satisfies the basic requirements of a RCRA closure plan, although it is unclear in several sections. The lack of clarity is not surprising considering the lack of environmental data and historical operational information at the YARL site. I agree with Dennis Erickson of Ecology that it is a rare occurrence that a facility can install an adequate ground-water (and soil) monitoring network in one step. The closure plan does acknowledge on page 14 that additional samples will be taken, as necessary.

I have a few comments on the closure plan which you may want to incorporate into your letter to Ecology:

1. Page 14 - Per 40CFR 265.112(c), YARL should state that any subsequent amendments to the closure plan shall be submitted in writing to Ecology within 60 days after an unexpected event has occurred which has affected the closure plan.
2. The compressor air for the air rotary drilling rig should be filtered to prevent introducing oil into the wells.
3. Dennis Erickson of Ecology has recommended that the upgradient well be located within 50 feet of the drainfield in order to better characterize the ground-water flow direction. YARL would likely prefer to locate the upgradient well further away in the northwest corner of the site to ensure a clean background sample. A single upgradient well does not account for spatial variability of ground-water quality and increases the risk of incorrect indication of contamination. YARL may want to consider installing two upgradient wells, one within 50 feet and one further away, in order to satisfy all these needs.
4. Page 9 - YARL should clearly state that all sampling and analytical procedures will comply with the appropriate methods described in the EPA manual SW-846, Test Methods for Evaluating Solid Waste.

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5. More detail needs to be provided in the soil sampling section of the closure plan. YARL should explain how the location of the drain tile will be determined prior to the soil sampling. It is stated on page 14 that the soil sampling methodology will be similar to the handling of the water samples. YARL needs to provide specific information regarding the sampling procedures, methods used to prevent cross-contamination between samples, and decontamination of sampling equipment. YARL should again consult with the SW-846 manual for acceptable procedures.
  6. Since certain volatile solvents are being analyzed in the soil samples, plastic bags are unacceptable soil containers. Clean, airtight glass containers should be utilized.
  7. The reference on page 14 to the National Oil and Hazardous Substances Contingency Plan (NCP) is incorrect. It should be the National Priority List (NPL). YARL should also state that final closure will be in compliance with the RCRA requirements of 40CFR 265 Subpart G.
  8. Regarding the contingent post closure plans on page 16, YARL should clearly state that it will comply with all applicable state and federal hazardous waste regulations with respect to waste handling, treatment and/or disposal.
- cc: Rice/Boyd M/S 533  
Cohen M/S 525  
Boys M/S 329